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SEP 20 2021

CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTAUNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTAPAUL HANSMEIER,
Plaintiff,

v.

DAVID MACLAUGHLIN et al,
Defendants.

Case Nos. ~~21-cv-748~~ 21-cv-1539 21-cv-1547
 21-cv-1167 21-cv-1546 21-cv-1550
 21-cv-1537 21-cv-1542 21-cv-1551
 21-cv-1538 21-cv-1543 21-cv-1552
 21-cv-1553

MOTION TO EXTEND TIME FOR SERVICE

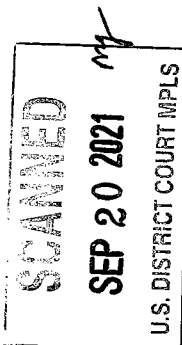
Plaintiff Paul Hansmeier respectfully moves the Court pursuant to Rule 4(m) of the Federal Rules of Civil Procedure to extend his deadline for serving any unserved defendants in the above-captioned matters until March 1, 2022. In support of this motion, Hansmeier is submitting the Declaration of Paul Hansmeier. This motion is based on the entire record of the above-captioned proceedings.

1. Federal Rule of Civil Procedure 4(m) provides that a plaintiff has 90 days from the date that a complaint has been filed to serve the defendants to the lawsuit.

2. With one exception, the above-captioned cases were filed with the Court on ^{July} ~~July~~ 1, 2021 when the Federal Defendants filed a notice of removal with the Clerk of Court. The only exception is case number 21-cv-1167, which was filed with the Court on

3. Courts possess broad discretion to extend the Rule 4(m) service deadline. The Court should extend the service deadline here.

4. First, Hansmeier has been diligent about attempting to complete service. In each of



the above-captioned matters, Hansmeier has made at least one (and in many instances, multiple) service attempts on the defendants.

5. Second, Hansmeier's success at completing service was an issue that was pending the Court's ruling, which issued on August 17, 2021. In light of the Court's ruling, it now is the case that Hansmeier must continue his service efforts.

6. Hansmeier's ability to do anything more regarding service has been significantly — or, more accurately, completely — hindered by the Federal Defendants' unlawful actions. On June 1, 2021, Hansmeier served ^{summons and complaint in} the above-captioned matters on the Federal Defendants. Within one week, Bureau of Prison officials placed Hansmeier in administrative detention, a/k/a the "Hole," while BOP officers "investigated" the above-captioned cases. Hansmeier has remained in administrative detention for 96 days and counting, while this "investigation" continues.

7. As a result of the foregoing illegal retaliation, Hansmeier has been unable to further his service efforts. As an administrative detainee, Hansmeier has access to food, water, a legal pad, a flexible 4 inch pen and not much else. Hansmeier has no access to his legal materials (and thus no access to service documents), no access to contact with the outside world (except for heavily-delayed mail and one 15 minute phone call/month), and no access to other resources he would need to re-attempt service.

8. Hansmeier has been informed that he will soon be subject to a retaliatory transfer — or "diesel therapy," as it is known in the BOP — on account of the above-captioned actions. While in "diesel therapy," Hansmeier will be bouncing from one BOP transfer center to another and will have zero ability to reattempt service. Hansmeier expects his "diesel therapy" to last up to 3 months.

9. The defendants in the above-captioned cases will not be prejudiced by an extension. The defendants are (or should be) on actual notice of these proceedings, due to letters Hansmeier has sent prior to his

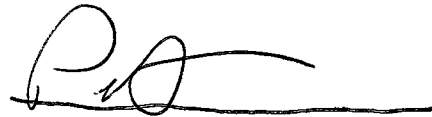
Administrative detention.

10. The requested deadline of March 1, 2021, will allow Hansmeier time to complete the unlawful/retaliatory "diel therapy" and reattempt service.

11. For all of the foregoing reasons, Hansmeier requests that the Court grant this motion

Respectfully submitted)

September 12, 2021



Paul Hansmeier

20953-041 Unit K3

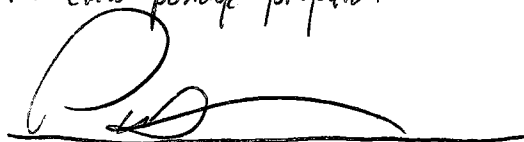
Federal Correctional Institution

P.O. Box 1000

Sandstone, MN 55072

PRISON MAILBOX RULE CERTIFICATION

I certify under the penalty of perjury that the above document was placed in the prison mailbox system on September 12, 2021 with first class postage prepaid.



Paul Hansmeier